

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

IRIKA SKEETE, <i>et al.</i>,)	
)	
Plaintiffs,)	No. 3:16-cv-0043
)	
v.)	District Judge Waverly Crenshaw
)	
REPUBLIC SCHOOLS NASHVILLE,)	Magistrate Judge Joe Brown
)	
Defendant.)	JURY DEMAND
)	

**PLAINTIFFS' MOTION FOR AN ORDER PRELIMINARILY APPROVING
SETTLEMENT, APPROVING NOTICE, SETTING OBJECTION AND OPT-OUT
DEADLINES, AND SCHEDULING FINAL APPROVAL HEARING**

Pursuant to Fed. R. Civ. P. 23(e), Irika Skeete and Allison Baird (the “Representative Plaintiffs”) respectfully move this Court for entry of an order: (1) granting preliminary approval of the proposed Settlement, (2) directing that the notice to the Settlement Class be disseminated by the Settlement Administrator, Dahl Administration LLC, in the manner described in the Settlement; (3) establishing a deadline for Settlement Class Members to request exclusion from the Settlement Class or file objections to the Settlement; and (4) setting a proposed schedule for completion of further settlement proceedings, including scheduling the final fairness hearing.

The Motion is supported by the following materials: (1) a Memorandum of Law, (2) the Declaration of Joe P. Leniski, Jr., which attaches and incorporates by reference therein the proposed settlement agreement between the parties (the “Settlement Agreement”), including exhibits A-D to the Settlement Agreement, and (3) the Declaration of Jeff Houdek. The Plaintiff has conferred with counsel for the Defendant, RePublic Schools Nashville, which does not oppose the Motion. The Representative Plaintiffs therefore respectfully request the Court enter the Order attached as **Exhibit 1** to this Motion.

Dated: September 15, 2017

Respectfully submitted,

/s/ Joe P. Leniski Jr.

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on September 15, 2017, a true and correct copy of the foregoing has been served on the following counsel of record via the Court's electronic filing system:

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/s/ Joe P. Leniski, Jr.

Joe P. Leniski, Jr.